

STEPHEN D. HANS  
& ASSOCIATES, P.C.  
LABOR & EMPLOYMENT COUNSEL FOR OVER 30 YEARS

45-18 Court Square, Suite 403  
Long Island City, New York 11101

T: 718.275.6700 • F: 718.275.6704

STEPHEN D. HANS  
Tel: 718.275.6700 x 204  
[shans@hansassociates.com](mailto:shans@hansassociates.com)

March 21, 2017

*VIA ECF*

Honorable Justice Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: **Darryl Robinson, et al v. Top of the Line Brooklyn, Inc., et al**  
**Case No. 1:16-cv-6152**

Dear Justice Broderick:

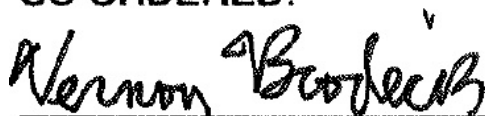
In accordance with your Rules and Practices, I am writing this letter as a pre-motion letter to withdraw from the above matter as counsel for the Defendants Top of the Line Brooklyn, Inc., Tip Top Car Wash, and Michael Ayngorn. I have informed Plaintiffs' counsel that this letter would be submitted.

My client's business is closed and my knowledge from him is that he is not employed. My client is unwilling and unable to pay for any legal services for this matter and directly told me such. Additionally, the cooperation level has been less than acceptable to this office. The client is unwilling to engage in any settlement discussions and my ability to represent him any further is difficult, if not impossible.

Should the Court instruct me to proceed by Order to Show Cause, I will do so expeditiously.

Respectfully Submitted,

SO ORDERED:



HON. VERNON S. BRODERICK <sup>3/22/2017</sup>  
UNITED STATES DISTRICT JUDGE

/s/

Stephen D. Hans (SH-0798)

[www.hansassociates.com](http://www.hansassociates.com)

Mr. Hans is directed to follow the process set forth in Local Rule 1.4 for making an application to withdraw as counsel. Defendants Top of the Line Brooklyn, Inc., Tip Top Car Wash, and Michael Ayngorn are granted a 45-day extension on all current deadlines in the case in order to facilitate service of Mr. Han's application to withdraw as counsel and their retaining new counsel. While Mr. Ayngorn may represent himself pro se if he so chooses, Defendants Top of the Line Brooklyn, Inc. and Tip Top Car Wash cannot appear in federal court pro se. Therefore, the corporate defendants are at risk of default if they fail to retain new counsel. Mr. Han should attach a copy of this endorsed letter to his application to withdraw.